G-8 Required Reports

As stated in the contingency plan, a record will be made of the time, date and details of any emergency which requires implementing the contingency plan.

Within 15 days after the incident the coordinator will submit a written report of the incident to the Regional Administrator. This report would include:

1. Home address and telephone number of the owner or operator.
2. Name, address and telephone number of the facility.
3. Date, time and type of incident (e.g. fire, explosion).
4. Name and quantity of material involved.
5. The extent of injuries, if any.
6. An assessment of actual or potential hazards to human health or the environment, where this is applicable.
7. Estimated, quantity and disposition of recovered material that resulted from the incident.

H-1 Outline of the Training Program

An outline of the training program is attached to this sheet.

Each employee has or will receive on-the-job training.

H-1b Training Content, Frequency & Techniques

Facility personnel will complete a program of classroom instruction and on-the-job training per the Job Training program outlined in Section H-1. New employees will be trained when assigned to this position and all employees involved will participate in an annual review.

H-1c Training Director

The training director is Mr. David Tice who has been trained in hazardous waste management through various governmental and environmental seminars.

H-1 Outline of the Training Program

JOB TRAINING

During Job Taining the following items are included:

Hazardous Waste Material Properties
- (a) What is hazardous waste and what types of materials will be accepted for disposal
- (b) Effects on the environment
- (c) Proper handling and controls

Sewers
- (a) What effects hazardous waste has on improper disposal in sewer systems

Contingency Plan
- (a) What is the plan
- (b) Why do we need the plan
- (c) How the plan works

Streets and Driveways
- (a) Effects from spills
- (b) Location in regard to storage

Company Emergency Coordinator
- (a) Who is the coordinator
- (b) Coordinator's responsibilities
- (c) How the plan works

Proper Fire Extinguisher Training
- (a) How to use
- (b) How to inspect
- (c) Where to use and when to use

Ground Water
- (a) Hazardous waste and ground water compatability
- (b) Effects on environment

Closure Plan
- (a) What is the plan
- (b) Why do we have a plan
- (c) How does the plan work

Inspection Log
- (a) What is the inspection log
- (b) What items need to be inspected
- (c) Why do we need the inspection

Manifest System
- (a) What is a Hazardous Waste Manifest
- (b) Why the manifest is required
- (c) Who initiates the manifest
- (d) What happens to the paper work

Operating Record
- (a) On site handling of hazardous waste
- (b) Off site handling of hazardous waste
- (c) Who keeps the records and for how long
- (d) Why records must be kept
- (e) Where will the records start and where kept

Personnel Training Records
- (a) Who does the training
- (b) Why must people be trained
- (c) How often do people need training and updating on regulations
- (d) Where are records kept and why

Transportation
- (a) Who can transport and how
- (b) D.O.T. regulations
- (c) Spills or accidents
- (d) License procedure

Waste Analysis Plan
- (a) Why do we need a plan
- (b) Who will do the testing
- (c) How often do we test
- (d) What will we test for

Regulations
- (a) E.P.A
- (b) D.N.R.
- (c) D.O.T.
- (d) R.C.R.A.
- (e) How do these regulations effect our operations

Hazardous Waste Thermal Treatment
- (a) Policy at Hamilton Industries
- (b) Off site material benefits
- (c) Violations of regulations

Hamilton INDUSTRIES Two Rivers Wisconsin 54241 Telephone 414 793-1121

To: MR. RICHARD BIRKHOLZ
MR. DONALD CORBEIL
MR. CLARENCE PLANSKY
MR. LEROY REMIKER
MR. JOE ROBINSON
MR. TERRY STEWART

cc: Mr. Charlie Kasal
Mr. John Brandt
Mr. Ken Cook

Date: February 17, 1982

From: Dave Tice

Subject: EMERGENCY ALARM SYSTEM

A requirement of the DNR and EPA to install an alarm system from our solvent storage and pumping area to the thermal treatment location in the boiler room. This alarm is required to notify either the pump station area or the boiler room attendant that a problem with handling our waste solvents has occurred. A two way alarm system has been installed, one in the boiler room outside the office and one outside the solvent pumping and storage area. The following procedure is to be implemented immediately.

I. Solvent Pumping Area

a. Prior to pumping any solvents into the storage tanks, the operator will notify the boiler room attendant that he is working in the area with waste solvents.

b. The alarm system must be tested prior to pumping.

c. Fire extinguishers shall be checked to make sure they are full.

d. If a spill or problem occurs, immediately activate the alarm system to the boiler room.

e. When alarm is received in the boiler room, the operator shall immediately go to the pumping area to assist the solvent pumping operator.

f. If a fire would occur, immediately call the telephone operator and report the location and nature of the fire. The telephone operator will call the fire department and activate the group paging system.

II. Boiler Room Area

a. When solvent pumping operator notifies the boiler room attendant he is working at the pumping station, check the alarm system, marking sure it is operational.

b. Check fire extinguishers, making sure they are full.

c. When burning waste solvents, check pipe and controls for leaks or malfunctioning of equipment. If a problem is discovered, do not operate the system until corrected.

d. If a fire would occur, activate the alarm system and call the telephone operator, reporting the location and nature of the fire. The telephone operator will call the fire department and activate the group paging system.

It is necessary to continually monitor for leaks or ruptures in valves, pipes, or other equipment. Spills, of any type, must be reported to your supervisor.

Failure to comply with these requirements will necessitate disciplinary action up to and including immediate discharge.

David L. Tice
DLT/rak

6-099-2
HAMILTON INDUSTRIES
FACTORY JOB DESCRIPTION

H-1a Job Title/Job Description

Job Title: Factory Utility

Job Number: 455 HBS

Department (s): 72

Plant Manager:

Foreman:

Job Analyst:

Supersedes Job. No.:

Effective Date:

Previous Evaluation Date:

JOB SUMMARY:

Factory Utility persons are responsible for the general appearance and cleanliness of the entire plant complex inclusive of washrooms and the removal of all waste material from the plant.

Must be physically able to do any and all phases of duty which may be required of Factory Utility Personnel. In general, pick up and dispose of all waste material.

DUTIES AND RESPONSIBILITIES:

Sweeping, cleaning and scrubbing of washrooms and fixtures. Cleaning of water fountains. Service and cleaning of eye glass stations. Keep aisles reasonably clear and swept. Stairwells to be swept regularly. Emptying of waste baskets, barrels, dirt boxes and other containers disposing of the material into compactors or the hog by use of manual devices or push carts. In some instances a conveyor or other automatic device may be available. Skids or other waste wooden material is to be broken or cut up into appropriate lengths/size for handling for the "hog" operator. Collection of waste solvents and emptying into storage tanks. Oil, paint, grease rags etc. to be gathered daily and taken to the appropriate place for disposal. At times, outside work may be required. This may require the use of power equipment such as power sweeper-scrubber, chain saw, back vacuum cleaners, lawn mowers (power and manual) and snow blowers.

QUALIFICATIONS:

Must be in good physical condition as lifting of skids, garbage, scrap containers and dumping the content into dirt boxes is

necessary. In addition, pushing dirt boxes to a given area or section of the plant and dumping those containing scrap into the compactor is an important requisite of the position. Must have the physical stamina to be on his feet, standing or walking, during the entire shift. Lifting is required up to 125 lbs.

Lunch Rooms:

Tables to be cleaned, room to be swept and mopped or scrubbed on basis of usage. General house cleaning as may be necessary (minimum of once each week). Windows to be washed as conditions permit.

6-099-2
HAMILTON INDUSTRIES
FACTORY JOB DESCRIPTION

Job Title	Power Plant Operator	Job Number	411 HBX (8009 HN)
Department (s)	Power Plant	Plant Manager	C. Kasal
Foreman	D. Schnell	Job Analyst	L. Smongeski
Supersedes Job. No.	8006 HN - H005 HK	Effective Date	4-5-77
		Previous Evaluation Date	

JOB SUMMARY:

With Minimum Supervison:

Should be able to attend all boilers using gas, coal or wood waste as fuel and govern the fuel supply depending on the steam demand.

Operate, start or stop all air compressors necessary to maintain required pressure on main air line. Maintain proper low pressure heating pressure by opening or closing the necessary valves to assure this heating pressure. Know proper sequence of opening valves and controls essential to avoid machine damage.

Take boiler water samples.

After analyzing sample, mix correct amount of chemicals to be added to assure proper feed water treatment.

Lubricate all necessary equipment in power plant to include turbines, compressors, reduction drives, pumps, stokers, conveyors, motors, generators and blowers.

Maintain good housekeeping in power plant.

During a boiler shutdown overhaul the boiler and related equipment to include: (This is done four times a year)

1. Draining boiler.
2. Washing out drums.
3. Turbine the tubes with the aid of a helper.
4. Brush and scrape drums to remove scale.

The following is done on a routine basis as required on daily inspection:

1. Check and repair valves as necessary.
2. Check and if necessary, change water glass.
3. Blow out soot chambers.
4. Any other required work on the shutdown unit.
5. Overhaul wood burners or gas burners, replace worn or damaged parts and make all necessary repairs.
6. Clean out cyclones, shavings spouts, stokers or conveyor whenever blocked.
7. Do necessary pipe fitting including measuring, cutting, threading and the bending of pipe.
8. Job requires day and night work on a revolving shift 5 to 7 days per week depending on type of fuel being used on weekends.
9. Certain phases of the job require working in dirty, dusty, and small cramped areas and high locations.

TOOLS WORKER MUST PROVIDE:

8" - 10" - 12" screwdrivers, 8" - 10" - 12" adjustable wrenches, vise grips and gas pliers.

SUPERVISORY RESPONSIBILITIES:

May supervise helper on jobs where more than one man is needed to do the job.

SKILLS, KNOWLEDGE AND ABILITIES:

Should have a thorough knowledge of all power plant equipment including piping, controls, valves, pumps, reduction drives, conveyors, blowers, motors, generators and switch gear, boilers and water treatment equipment, gas burners and controls in order to overhaul, repair or replace damaged or worn parts.

Should possess the ability, in an emergency without supervision, to take the proper steps necessary to correct any malfuctions of any of the above mentioned equipment or any other equipment in the power plant.

Must have very good color perception.

H-1b Training Content, Frequency & Techniques

Facility personnel will complete a program of classroom instruction and on-the-job training per the Job Training program outlined in Section H-1. New employees will be trained when assigned to this position and all employees involved will participate in an annual review.

H-1c Training Director

** The training director is Mr. David Tice who has been trained in hazardous waste management through various governmental and environmental seminars. Mr. Tice has been responsible for the hazardous waste program at Hamilton since 1980. He has participated in a two day Hazardous Waste Training Workshop in May of 1983 conducted by the Wisconsin Council of Safety. He also attended a two day workshop in October of 1980 conducted by Lion Technology, Inc., on a Compliance Management Course on the applicable regulations of the United States Environmental Protection Agency and the United States Department of Transportation regarding the safe disposal of wastes designated as hazardous.

H-1d Relevance of Training to Job Position

The hazardous waste management program at Hamilton Industries has been developed and implemented under the direction of Mr. David Tice and Mr. J. Brandt. This includes the contingency plan implementation.

H-1e, H-1e (1), H-1e (3), H-1e (4), & H-1e (6)

The Security Staff

The Security Staff in the Emergency Organization is extremely important, since they are oftentimes the only ones present at the facility during off-hours. There are several procedures to be aware of when "on watch" ... before ... during ... after a fire or other emergency.

An in-depth study of the plant is a priority - learning all they can about the normal sounds, sights and smells, the Security Officer will be able to recognize when something is wrong. The Security Officer should know how to shut off gas, oil, steam, or electricity in the event of an emergency, and in addition be acquainted with what additional duties need to be performed.

(Sprinkler Valve Operator, Fire Pump Operator and possibility of the duties of the piper especially when involved in replacement of sprinkler heads)

It is the responsibility of the Security Staff Personnel to become an expert on the protective equipment by learning where extinguishers are located, where is an additional supply, if needed, and how to use them. In addition, the location of fire hoses and any additional hoses and how to use them. They should know all facets of the automatic sprinkler system and what sprinkler control valves cover each area. It is important to have a valve lock key in his or her possession at all times as well as know where the FM Red Tag System Cards are located for controlling sprinkler valve operation.

Security Personnel must make their rounds carefully. The FIRST ONE AFTER THE PLANT CLOSES IS ESPECIALLY IMPORTANT. Fires are more likely to start just after workers have left with machines left running, heat producing equipment not shut off, and other unsafe conditions such as doors and windows left open along with cigarette butts and matches from careless smokers. Any conditions that are dangerous should be reported and corrected immediately. If need be, they should be reported again each day until corrected.

When a fire emergency occurs during off-hours, it is the responsibility of the Security Staff to sound the alarm, check the sprinkler valve and fire pump, guide the fire fighters (Two Rivers Fire Department) to the emergency area, notify plant officials, stay on hand, make sure the fire is out, put sprinkler protection back in service and conduct a fire watch for a proper period of time of the area involved.

DUTIES OF THE SECURITY SUPERVISOR AND HIS STAFF

The Security Supervisor and members of his staff have full responsibility for fire safety. His/their duties are/include:

1. Before any fire:

   Make a study of the plant, the exits, any peculiar hazards, and then formulate evacuation routes and a fire plan.

   Assistance can be obtained from your local fire department or other Hamilton Industries personnel.

   The Security Staff will familiarize themselves with all fire fighting equipment and its maintenance. The Supervisor of Security's approval must be obtained before any protection systems can be temporarily impaired.

   Factory Mutual valve shut-off tags are to be used. These are obtained from your Factory Mutual Office.

   The Security Staff, under the direction of the Supervisor, shall make weekly inspections of escape routes (aisle clearance, if possible, on a day to day basis) exits, and all fire equipment, including the sprinkler valves, which are to be locked OPEN.

   The Supervisor of Security has the responsiblity of keeping the PEO trained and ready at all times. Each member shall have a specific function/duty to perform in the event of a fire or other emergency.

   The Supervisor of Security is also responsible for seeing that each member of the PEO understands that his personal safety is of prime importance.

   The Supervisor of Security has the full responsibility for keeping all personnel trained with respect to work habits, safety procedures in event of a fire or emergency, portable fire extinguisher use and exit drill, etc.

2. When a fire occurs:

   The Supervisor of Security, upon receiving notice of a fire, will report to that area immediately and issue what orders or directions necessary.

   The Supervisor or Security will give such directions as are necessary to the PEO and have overall charge of the evacuation.

   If necessary he or his designate will also be responsible for the salvage crew and its operation.

The Supervisor of Security will direct the specialists (sprinkler valve men, etc.) in carrying out their tasks.

The Supervisor of Security is to ensure that no one has become overzealous or acts in an unsafe manner.

3. After the Fire:

The Supervisor of Security is to ensure:

That the protection equipment is ready for immediate operation in case the fire restarts. If automatic protection cannot be re-established immediately, he is to ensure the fact that the valves are manned until such time as protection can be restored to full operation.

That all stock, equipment etc., is under 24 hour guard until adequate provisions are/have been made.

The Supervisor of Security is to submit a report to his manager on the fire, its cause, if known, procedures carried out and suggestions for improvement.

The Supervisor of Security is responsible for ensuring that all fixed systems are reinstated.

The Supervisor of Security is responsible for ensuring that all extinguishers have been refilled and replacements are hung.

Sergeants, Security and their duties:

1. Periodically evaluate the equipment provided for fire fighting.

2. Be responsible for setting in motion necessary procedures for replacement/replacing missing equipment or repairing inoperative equipment.

3. Bring to the Supervisor of Security's attention to any situation likely to reduce the effectiveness of fire fighting operation with proper recommendation toward an effective operation. Be prepared to put your recommendations into practice immediately.

4. Work with the Supervisor of Security in providing plans of action to meet possible fire or and emergency situations.

5. Continue a review (weekly) of the PEO rosters and prepare recommendations for additional members to maintain full PEO strength.

6. Work with the Supervisor of Security in all necessary training and education involving fires and other emergencies.

DUTIES OF THE SPRINKLER VALVE MAN (DESIGNATED MEMBER OF THE SECURITY STAFF or PEO MEMBER)

1. Before a Fire:

   The Sprinkler Valve Man is to study the locations of the sprinkler control valves for all areas and study all exit routes.

   The Sprinkler Valve Man is to ensure that the sprinkler valves are always open and ready.

2. When A Fire Occurs:

   The Sprinkler Man is to go to the sprinkler valve controlling the system in the fire area.

   He is to open the valve if it's closed, and keep it open until he is informed by a member of the Security Staff to close it.

   He is to make sure that the valve controlling the sprinkler systems in adjacent areas are open.

3. After the Fire:

   The Sprinkler Man is to remain at the closed valve until the automatic sprinkler protection is restored, or until officially relieved.

   The Sprinkler man is to stand ready to re-open the valve immediately if the fire restarts.

   The Sprinkler Valve Man, prior to being officially relieved is to be sure the valve is opened and check with a drain test. (this will be done only after official notification that all sprinkler heads have been replaced and he may proceed to put system back in service)

   1. Closing two inch drain if necessary.

   2. Opening valve and lock in open position.

<u>The Sprinkler Valve Operator</u>

One of the most important jobs in the organization is that of the sprinkler valve operator. If the sprinkler valves are closed, the plant has lost its main line of fire defence: automatic sprinkler protection.

The person assigned to this position must know the location of the valves and be responsible for their operation.

In the event of a fire, the sprinkler valve operator is to go to the valve controlling the fire area, make sure it is open, and stand by the valve until it is ordered closed by the person in charge.

After an explosion, building collapse the sprinkler valves should be examined carefully for damage. Great care should be taken to close only those sprinkler valves that are necessary to isolate broken piping, and in all cases, this decision should be made only after checking with the person in charge.

DUTIES OF THE FIRE PUMP MAN (DESIGNATED MEMBER OF THE SECURITY STAFF OR PEO MEMBER)

1. Before a Fire:

   The Fire Pump Man is to make sure he understands when and how to use the fire pump.

   Know what the pump/pumps can do and make sure that it is well-maintained and operative.

   Study all exit routes.

2. When a Fire Occurs:

   If the pump (gas/electric) is not operating start it.

   If it is automatic, make sure it's running.

   Keep it running until official instructions are received to shut it down.

3. After the Fire:

   Be sure the pump is again ready for immediate action.

The Fire Pump Operator

When the alarm sounds, the pump operator checks the automatic starting pumps, starts it if it fails to start automatically for any reason, and keeps it in operation until instructed to shut down.

Preferably, personnel assigned to this job of fire pump operator should be the most familiar with the operation and care of the pumps. Anyone else given the job should be thoroughly trained in starting them manually and should understand the importance of the pumps to protection. Prompt starting of pumps is most important.

DUTIES OF THE PIPER (ALWAYS A MEMBER OF THE PEO - FROM MAINTENANCE)

1. Before a Fire:

   The piper should/must be familiar with steam, water and other piping, and study exit routes.

   The Piper should make sure he knows how the valves open and close, particularly in areas where hazardous materials such as gas, flammable liquids and other comparable materials are present.

   He should understand how he fits into the basic plan as a member of the PEO.

2. During a Fire:

   The Piper should be ready to shut off flammable gas and main gas lines at the meter in the fire area or wherever necessary.

   He should be ready to close off steam in other lines that might interfere with fighting the fire.

   He should be ready to operate emergency drainage systems and take whatever piping measures are necessary to protect the plant and help fight the fire.

   He should be ready to replace the sprinkler heads that open.

3. After the Fire:

   He should make sure the valves on flammable and main gas lines at the meter stay shut until officially cleared through his superior or authorized personnel.

   He should be prepared to follow instructions, when authorized, to turn on the main gas line at the meter or other lines.

   Keep emergency drainage systems operating and stand by for further instructions.

   He should replace automatic sprinklers as directed by his superior or the Supervisor of Security.

   He should make sure that all gas and other appliances involving his function are properly turned on.

The Piper

The piper must be familiar with the steam, water and other piping in the assigned area of responsibility and in case of an emergency must know how and be ready to shut off flammable gas and liquid systems in the emergency area.

Windstorm damage, explosion or collapse can result in broken or ruptured piping which must be shut off immediately. Advance planning and familiarization with equipment controls is essential so that the piper will respond quickly and effectively when an emergency occurs.

DUTIES OF THE ELECTRICIAN

1. Before a Fire:

   To know the locations of all switches controlling electricity and to study all exit routes available.

   To be sure he understands the basic plan of the Emergency Organization regarding the use of electricity during the fire or other emergency.

2. When the Fire Occurs:

   Is to immediately shut down electrical fans, ventilation equipment, etc., according to the pre-arranged plan.

3. After the Fire:

   Before turning on the electrical power, determine that it is safe to do so. (Checked with his superiors)

   Will stand ready to supervise the electrical safety of the personnel who must work in the damaged area.

   If it is unsafe to use certain electrical lines, the electrician must lock the switches governing them and POST SIGNS nearby at a convenient location.

<u>The Electrician</u>

The duties of the electrician include knowing the location of switches in the assigned area and where portable generators, extension cords, and emergency electric power equipment are located.

This person must be thoroughly briefed on the use of electricity during a fire or other emergency, and may be accountable for shutting down electric fans, or handling ventilation/ventilating equipment according to a perarranged plan. It may also be necessary for the electrician to establish temporary lighting should regular power be lost, as might happen during a storm, it may, in other instances, dependent on the amount of water in the lower floor, be necessary to cut off power to basements, ground floors, or below grad areas of the facility.

DUTIES OF THE EVACUATION SQUAD (Department or Floor Supervisor)

1. Before the Fire:

The Evacuation Squad is to study sketches to learn the location of all escape routes and exits. This is best achieved by a walk through of the complex and viewing of the Evacuation Route Signs.

2. During a Fire:

Upon the notification of a fire, the Evacuation Squad or member will evacuate that portion of the plant or what ever is necessary.

This will be done in an orderly fashion to a predetermined location.

The Evacuation Squad is to donduct a survey of personnel within their area to ensure that all people are present.

The Evacuation Squad Members are to report their respective situation to their Evacuation Squad Leader (General Supervisor) and to wait and abide by his or her instructions.

The Evacuation Squad and Evacuation Squad Leader is responsible for crowd control at all times.

3. After the Fire:

Follow directions / orders as given by the Plant Manager or and Company Officers.

FIRE SQUAD.

Selected and designated employees will be assigned the duty of a Fire Squad member for a particular section, floor or area.

This formalized group is organized for the purpose of attacking an incipient fire anywhere in their designated area.

An incipient stage fire is defined as one "which is in the initial or beginning stage and CAN BE CONTROLLED OR EXTINGUISHED with portable fire extinguishers, Class II standpipes or small hose systems without the need for protective clothing or breathing apparatus."

From the stand point of property conservation this is a proper method of operation in terms of response time with the formalized group responsible for specific fire areas.

The purpose of the group, in an emergency organization, is to attacked and extinguish or control an incipient stage fire until the City Fire Department arrives at the scene.

The remaining employees are evacuated from the area.

DUTIES OF THE FIRE SQUAD

1. Before a Fire:

The Fire Squad is to learn the locations of all fire extinguishers, fire hoses and other portable equipment in the complex and to study all emergency / evacuation routes.

Each member of the squad must become familiar with the different types of extinguishers and how to use them.

2. When a Fire Occurs:

When the Fire Squads receives notification of a fire they will report to the fire scene as quickly as possible.

At the fire scene they will function as a team. They will utilize the necessary equipment available such as fire extinguishers. If the sprinkler system in this area has activated they will not utilize the 1½ inch hose from the same building to fight the fire this will jeopardize the water flow.

When extinguishers are used and emptied during a fire, the Fire Squad member will lay the extinguishers on their sides to ensure that it is an empty extinguisher for all concerned.

The extinguisher being laid on its side is to indicate that the extinguisher is not functional.

3. After the Fire:

The Squad members will stand by after the fire until Officially dismissed.

The Squad members will report to Security all extinguishers that may have been used.

DUTIES OF THE SALVAGE SQUAD MEMBERS

1. Before a Fire:

The Salvage Squad Members are to:

know to whom they report when an emergency occurs or a fire breaks out.

know the location of mops, pails, brooms and other salvage supplies and to study all exits.

make sure they understand the basic plan for salvaging equipment and stock.

2. When a Fire Occurs:

Are to report to their Salvage Squad Leader at once.

Are to carry out specific assigned tasks, such as drains and drain lines open and moving equipment and stock.

Are to cover machines, inventory, raw material, etc. with plastic sheets, etc., to portect them from water damage.

3. After the Fire:

At the first opportunity, the Salvage Squad Members are to check with the Salvage Squad Leader to determine if there are any special assignments to be carried out.

After the fire, the Salvage Squad Members are to start mopping up, removing water from all covers, benches, floors, etc.,.....

Immediately after the fire, the Salvage Squad Members are to take necessary steps to prevent rusting of mavhinery parts, etc.

Immediately after the fire, the Squad Members are to conduct a watch until proper secubity is installed.

The Salvage Squad

Getting back to normal is the primary objective after an emergency - ~~xxxxx~~ salvage should start as soon as practical. The insurance company and ~~xxxxxxxxx~~ the Factory Mutual District Office should be informed at once.

The company employees are probably best qualifed to undertake salvage of the company's property. The members of this squad will be moving and or covering machinery and work ~~in progress~~ with tarpaulins, plastic sheeting, etc., to cover them from water damage.

The time for intensive salvage efforts is after the fire is out or the storm is over. There must not be any hesitation to Return ~~xxxx~~ personnsl especially in this immediate stage ~~od~~ of salvage, since this could result in an overall savings of time and material.

First step: Restore protection immediately. Sprinklers that have opened must be replaced, broken branch lines capped, control valves reopened and discharged ~~xpxx~~ fire extinguishers replaced.

Remember that fire can rekindle, doing more damage the second time unless protection is fully prepared to meet the renewed threat.

Next Move: Concentrate on valuable stock and equipment. Prompt ventilation, excess water mop-up, or moisture removal from finished parts may be needed. A general "drying-out" may be accomplished by putting heat and ventilation ~~xy~~ systems in service.
Priority attention should be given to major damage to equipment or processes vital to production.

DUTIES OF THE FIRST-AID PERSON

1. Before the Fire:

   Responsible for the maintenance of an updated first-aid kit.

   Responsible for the updating of his or her personnel and their personal knowledge and to be well trained at all times.

2. When a Fire Occurs:

   The First-Aid Personnel are responsible for administering or administration of all first-aid as necessary.

FIRE EXTINGUISHER INSPECTION.

Inspection: is a quick check that an extinguisher is available and will operate.

The extinguisher should be in its designated place, that it has not been actuated or tampered with, and that there is no obvious or physical damage or condition to prevent operation.

Inspection - Frequency: Extinguishers will be inspected monthly, or at more frequent intervals when circumstances require.

Inspection - Procedure:

1. The extinguisher will be in its designated place.

2. Access to, or visibility of, the extinguisher shall not be obstructed.

3. The operating instructions on the extinguisher nameplate shall be legible and face outward.

4. Any seals or tamper indicators that are broken or missing shall be replaced.

5. Any obvious physical damage, corrosion, leakage, or clogged nozzles shall be noted.

6. Pressure gage reading when not in the operable range shall be noted.

NOTE: When an inspection reveals that tampering has occurred, or that the extinguisher is damaged, impaired, leaking, under - or overcharged, or has obvious corrosion, the extinguisher shall be subjected to applicable maintenance procedure.

Record Keeping: Each extinguisher shall be equipped with a tag or label securely attached that indicates the year and the month. As the monthly inspections are conducted the proper punch will be used which will be our method of indicating that an inspection was conducted during that month.

FIRE EXTINGUISHER INSPECTION.

MAINTENANCE PROCEDURE: shall include a thorough examination of the three basic elements of an extinguisher.

a. Mechanical parts

b. Extinguisher agent

c. Expelling means

PERMANENT FILE RECORD: In addition to the required tag or label a permanent file record shall be kept for each extinguisher. This file record should include the following information as applicable:

a. The maintenance date and the name of person or agency performing the maintenance.

b. The date when last recharged and the name of person or agency performing the recharge.

c. The hydrostatic retest date and the name of person or agency performing the hydrostatic testing.

d. Description of dents remaining after passing hydrostatic testing.

e. The date of the six year maintenance for stored pressure dry chemical and Halon 1211 type.

IN ADDITION: The permanet file record will show:

a. Type of extinguisher

b. Weight of extinguisher

c. Serial number of the extinguisher and Manufacturing date.

d. Annual and semi-annual inspection information.

e. AND any other information that we feel is necessary.

FIRE EXTINGUISHERS AND LOCATIONS.

Utilizing a plant sketch each fire extinguisher will be properly identified as to type

C - dry chemical

W - water

H - halon

Cart - 5 extinguishers: 3 dry chemical A B C

2 water

and approximate location.

Example: For the Main Plant Complex there will be six (6) Main Plant Sketches utilized, as follows:

Basement

1st floor

2nd floor

3rd floor

4th floor

5th floor / and Mahon

The sketch designated for the particular floor will show the type of fire extinguisher as to location and a general over lay as to number of extinguishers available in any certain section.

Fire Extinguisher and Fire Hose Inspection.

This inspection must and should take place or be done as a part of the duty tour.

It is not expected that each and every fire extinguisher and fire hose can be checked/inspected during each eight hour period of duty.

It is recommended that each of the Security Officers establish their own schedule for inspection. Your daily schedule should culminate with a completed inspection of each and every fire extinguisher and fire hose once each month.

Based on this information it is expected and necessary that each Security Officer maintain his own listing of the fire extinguishers and fire hose he checks or inspects on a daily bases. This listing will be kept in your private drawer and be subjected to inspection by the Chief Security Officer. In addition, on completion of each month, your report will be placed on file as a permanent record.

Fire Extinguisher Inspection

Read fire extinguisher gauge. Pointer should be in white operating pressure range.
Check the seal, is it secure?
Inspect hose and nozzle for any obstructions.
Report all missing fire extinguishers.

When reporting a fire extinguisher in need of service or missing, the following: Provide the building and floor number and approximate location of the extinguisher or board.

Fire Hose Inspection

Inspect each fire hose for cuts, tears, burns, tampering and other damage.
Inspect hose reel or hanger for any damage.
Is fire hose properly wound on the reel or hanger?
Is fire hose available or is it obstructed?
Is the fire hose connected to the water system?
Is the water valve or handle damaged?
Is the nozzle secured?
Check immediate water pipe or line for any possible damage.

When reporting a fire hose, reel, hanger or water pipe in need of service follow the above directive for fire extinguishers.

Fire Hose and Fire Extinguishers.

Fire Hose and Fire Extinguishers are strategically located through out the entire plant complex.

Main Plant:

Every floor of each building is connected to our own water system, the East Twin River, with the Pump House (Building No. 19) being our intake pump.

The Pump House is provided with an Electric Pump, Gas Pump and a Jockey Pump.

These pumps supply us with the necessary water to adequately operate our sprinkler system as well as provide us with a water source which is connected to each Fire Hose.

Roosevelt Avenue and Columbus Street Plants:

The water supply for the sprinkler system and Fire Hose is provided from the city water main.

Prior to charging or turning on the water supply when utilizing the fire hose it is necessary to remove them from the "reel or the Taraton hose hanger." Each is a simple operation: the reel operation is just that a fire hose connected to a reel: grab the nozzle and walking away from the reel the hose should automatically follow.

After the hose is extended turn on the water valve at the connection, not before. Notice also that the hose nozzle will permit several variations of water flow, dependent on the immediate need of the operator.

The Taraton hose hanger is a low silhouette fire hose hanger. Primarily placed in areas where the hose reel has been damaged through operation of motorized units in the movement of material.

The top hanger device is actually a spring covered with a metal material. To release the hose take the hose nozzle and pull down this will cause the upper hanger to spring down and forward releasing the entire hose.

However, prior to turning on the water supply it is advisable to run out or extend the hose. The nozzle is identical to the above and will supply a variation as to water flow.

As you become familiar with the plant complex you will notice several different nozzles as to type such as brass or plastic. However, the basic operational function is identical.

HOSE NOZZLES:

Several different types or styles of hose nozzles will be found through out the complex.
A portion of them are brass and are secured to the hose coupling (fire hose coupling) by a set screw.
Prior to using a wrench, in an attempt to release the nozzle, check the base for a set screw which must be unscrewed or released by an allen wrench.
Once the set screw is released or unscrewed you will find the nozzle can be unscrew from the hose coupling, in most cases, by hand.

Fire Extinguishers.

Basically throughout the entire plant complex you will find two different types of fire extinguishers:

1. Water Extinguisher.

2. A B C - Dry Chemical Extinguisher.

The water extinguisher is NOT TO BE USED ON ANY ELECTRICAL FIRE.

For usage and information on the A B C or Ansul A B C Type Extinguisher you will find several pages in this booklet providing you with all pertinent data.

Operation of:
Again basically identical. Pull the pin which is sealed and engaged into the upper handle. This pin release will provide you with the contents of the extinguisher being used as you squeeze the trigger. With the other hand direct the hose as is necessary to extinguish the fire. It is advisable to position yourself so that any possible wind or air currents blow the fire away from you.

Fire Extinguishers.

The fire extinguisher as utilized by Hamilton Industries are placed through out the complex for our convenience and for the convenience of others in the event of a fire. A fire extinguisher is of valve only when used properly and immediately on a small fire. The content be it dry chemical or water is very limited and each fire extinguisher should be used to avoid wasting any portion of the content.

The policy of Hamilton Industries is to notify the Two Rivers Fire Department immediately after a fire is discovered regardless of how small.

Everything possible must be done to have each and every extinguisher, when needed, fully charged/ filled and operational. When a fire is discovered is no time to find that the extinguisher, in your possession, is not charged or/and will not operate.

TO OPERATE THE ANSUL SENTRY EXTINGUISHER:

1. Hold upright.
2. Pull ring pin.
3. Press lever.
4. Aim hose nozzle.
5. Direct at base or fire/flame.

   Utilize a back and forth sweeping motion to cover the entire area involved.

All extinguishers shall be immediately recharged after usage. To recharge/refill the Ansul Extinguisher, the following:

1. Invert the extinguisher and press lever to release pressure.
2. Remove the valve from the 2 3/4 lb models. On other models, remove hose and remove valve. On the 5 lb models remove hose.
3. Fill to rated capacity with Ansul Dry Chemical specified on the name plate.

NOTE: Before refilling the dry chemical extinguisher it is recommended that you check the cavity for any remaining chemical. In the major portion of instances you will find a quantity of the dry chemical packed against the sides and bottom. Do what ever is necessary to free the existing material prior to refilling.

4. Clean the dry chemical from the valve, O-ring, seating surface and threads of the shell.

5. Lubricate the O-ring using a good grade of multi-purpose grease. (Vaseline is acceptable.)

6. Screw valve in place.

7. Install recharge adaptor.

8. Press lever and pressurize to 195 - 200 psi with dry nitrogen. Release the lever.

9. Insert the ring pin and remove the recharge adaptor.

10. Test for leakage. Observe the extinguisher gauge for a 48 hour period after you recharge. There should be no loss of pressure. If the gauge indicates a pressure loss, raise pressure and retest for leakage.

11. Inspect the hose and nozzle for obstructions (nozzle only on 2 3/4 and 5 lb models)

12. Replace the hose. Install self locking visual inspection seal. (Replace nozzle only on 2 3/4 and 5 lb models.

Weight, of the Ansul Dry Chemical Extinguisher:

Specified on the name plate.

TO OPERATE THE WATER EXTINGUISHER:

NOTE: This fire extinguisher is not to be used on electrical fires.

1. Hold upright.

2. Pull Ring Pin.

3. Press lever

4. Aim nozzle.

5. Direct at base of fire/ flame.

Use a back and forth sweeping motion to cover the entire area involved.

All extinguishers should be immediately recharged after use.

To recharge/refill the water extinguisher, the following:

1. Invert the extinguisher and press lever to release pressure.

2. Remove valve/top, gauge and hose.

3. Fill extinguisher cavity with city water. (fill with water until about 3 or 4 inches from the top)

4. Inspect the hose and nozzle for any obstructions.

5. Replace the valve, (top), gauge and hose.

6. Hose for air pressure is located in the high boy cabinet, secure the hose to the adaptor on motor by use of spring applicator.

7. Apply air pressure to air pressure valve on the extinguisher.

8. Pressurize the extinguisher that the pointer is to the right or beyond the center of the gauge.

9. Insert the ring pin.

10. Seal. (test for leaks, is pressure remaining constant?)

FIRE EXTINGUISHER

ANSUL A B C TYPE EXTINGUISHERS

Each symbol indicates the type of fire (fuel) on which the extinguisher may be used safely and effectively.

A rated extinguishers - for use on ordinary fires: wood, paper, cloth, rubber, many plastics, etc.

CAUTION - Burning plastic may release toxic fumes.

B rated extinguishers - for use on flammable liquids, gases and greases: motor oil, paint thinner, dry cleaning agents, gasoline, propane, natural gas, etc.

C rated extinguishers - for use on live electrical equipment, to prevent possible shock or electrocution.

THEREFORE, a fire extinguisher, for example an A B C extinguisher indicates the type of fire (fuel) on which the extinguisher may be safely and effectively used.

IT IS OF UTMOST IMPORTANCE THAT ALL SECURITY PERSONNEL BECOME FAMILIAR WITH THE PLANT EMERGENCY ORGANIZATION (S.P.I.)

In event of a fire, if necessary, evacuate the employees of the hazard area and call the fire department. Use the nameplate information on the extinguisher to help ascertain if you can effectively deal with type and size of fire you have.

When fighting the fire:

1. Maintain the proper distance (6 to 8 feet for most dry chemical hand portable extinguishers).
2. Try to position yourself so that any possible wind or air currents blow the fire away from you.
3. Pull the safety pin, or release any safety locks on the fire extinguisher.
4. Hold your extinguisher firmly and begin spraying the agent at the near edge of the fire. (Ansul devices usually have a trigger to squeeze at the handle or nozzle. Refer to the nameplate on the extinguisher and know how to activate the particular extinguisher before the need arises).

5. Move the stream rapidly side to side covering the entire width of the fire.

6. Advance slowly as your extinguisher pushes the fire back. Try to maintain the optimum distance from the front edge of the fire.

7. After the fire is out, step back and watch for possible reignition.

NOTE: In fighting a fire or cleaning up after, try to avoid prolonged close contact with dry chemical extinguishing agent. The agent is not toxic, but prolonged contact may result in temporary eye or respiratory irritation.

FOLLOWING A FIRE - there are three things to do immediately:

1. Secure the area so that the fire won't start again.

2. Clean up the debris. Avoid damage to the surrounding area or equipment by sweeping or vacuuming dry chemical and fire debris promptly.

3. Recharge of the fire extinguishers is required immediately. Improper filling can result in inoperable/dangerous units.
   a. Regardless of how little or how much extinguishing agent was used.
   b. The refill agent must be the same as originally used.

INSPECTION OF THE FIRE EXTINGUISHER - An almost constant check is desired. What to look for:

1. Extinguisher
   a. Proper place
   b. Visible
   c. Accessible
   d. Clean
   e. Any physical damage
   f. Any corrosion/rust
   g. Proper pressure
   h. Proper amount of agent (weight/heft)

2. Nameplate
   a. Legible

3. Safety Seals/Indicators
   a. Intact
   b. Proper position

4. Hose

   a. Cracked
   b. Cut
   c. Worn
   d. Coupling intact

5. Nozzle

   a. Clear of obstructions
   b. Trigger operates smoothly

6. Mounting bracket

   a. Firmly attached

7. Inspection Record

   a. Dated and initialed.

H-1e (1)

WATER FLOW TEST:

The water flow test is conducted once each month by a representative of A.D.T. with assistance from the American Hamilton Security Staff.
It is usual for the A.D.T. representative to open the water flow test valve and the American Hamilton Security Officer register the time it takes to transmit the alarm to the board by a steady red light and tone signal.
Two way Walkie Talkies are used.
The A.D.T. representative will inform the Security Officer by walkie talkie when he is opening a particular valve.
The Security Officer tabulates this time and this is followed by the time it takes to have a red light and steady tone on the annunciator board.
This information is properly recorded by the Security Officer on the Water Flow Test and Manual Hand Trip form.
In a major portion of inspections (monthly Inspections) one half the risers are subjected to the water flow test with the remaining being involved with the manual hand trip. The following month will be just the opposite.
A proper signal (red light and steady tone) should be transmitted within one and one half minutes after the water flow test valve has been opened. If not, record this information accordingly that corrections can be made.

FLOW TEST

1. Flip green light switches down.
2. Remove disk.
3. Go to Pump House
   a. Turn Gas Pump from automatic to off.
4. Return to Security Office.
5. Desk Duty.
   a. Register activation of Annunciator Board as flow test is conducted and alarms transmitted.
6. On conclusion of tests:
   a. Person conducting the test will call headquarters to determine that each flow test was received.
      1. Request from persons conducting test the extension number of the telephone he is using.
         a. The person conducting the tests will remain at that extension.
7. Go to Pump House
   a. Gas Pump will remain in Off Position
      1. Pump up by activating Electric Pump for three (3) minutes.
8. Turn Gas Pump from Off to Automatic.
9. Return to the Security Office, check the Annunciator Board.

Continuation

FLOW TEST

10. Contact the person conducting the Flow Test at the extension he gave.

    a. Your check of the Annunciator Board will inform you if all Risers have cleared or:

        1. Inform him that Riser number _____ did not clear.

        2. If and when the Annunciator Board clears, proceed with Hand Trip of Risers not involved in Flow Test.

Continuation

FLOW TEST -

HAND TRIP

With the exception of the Risers involved in the Flow Test all other Risers are hand tripped.

Hand Trip consists of opening each transmitter switch box at the Riser Location and raising the hammer or activating the switch.

It is recommended that you activate or hand trip the switch to an eight (8) count.
Then release the hammer to its proper position.
On conclusion of the hand trip call headquarters for any information involving the hand trip test just completed.

If tests are complete and everything is proper:

Clear the Green Lights, extend switches to their highest point and return to center.

Rewind: Should change transmitter light from red to yellow.

Replace Disk.

Complete form - 6-031

Water Flow Test and Manual Hand Trip.

NOTE: Testing personnel, employees of Hamilton Industries (person at the Security Desk) and person (s) contracted by A.D.T. to conduct tests.

Be sure check marks are properly entered.

TESTING PERSONNEL: _____ DATE _____

FOR HAMILTON INDUSTRIES: _____ FOR A.D.T.: _____

BLDG. RISER	WATER FLOW TEST		MANUAL HAND TRIP		COMMENTS
	APPROVED	DEFECTIVE	APPROVED	DEFECTIVE	
28					
29					
42					
24					
25					
26					
22					
3					
2					
1					
4					
6					
11					
13N					
13S					
8					
9					
10					
18					
38					
12					
27					
31					
20N					
20S					
34					
33					
21					
COLUMBUS					
ROOSEVELT					

COMMENTS: _____

31 AI

WATER FLOW TEST FOR BUILDING RISERS:

Riser:	Valve Location:	Floor:	Location:
28	B - 28	3	North end, by aisle into building 22 at soil pipe.
29	B - 29	3	East wall just north of the elevator.
42	B - 42	1	East side of riser, remove ceil tile.
24	B - 24		
25	B - 25	1	East wall, north corner.
26	B - 26	3	Men's room, east wall at soil pipe.
22	B - 22	3	Center post at fire hose.

A.D.T. Battery location: Morgue, on the north wall: 3 cabinets with two batteries in each cabinet.

3/AJ

WATER FLOW TEST FOR BUILDING RISERS:

Riser:	Valve Location:	Floor:	Location:
3	B - 3	1	General work area, southwest corner.
2	B - 2	Attic	Six (6) feet west of the elevat ceiling or roof of attic.
1	B - 1	Attic	Six (6) feet west of the elevator, ceiling or roof of at
4	B - 4	3	East end, south corner.
6	B - 6	Entrance	Personnel office entrance, remove ceiling tile: 3rd tile to north from front double door
11	B - 11	3	North wall, about 30 feet west of doorway from building 8.

WATER FLOW TEST FOR BUILDING RISER:

Riser:	Valve Location:	Floor:	Location:
13 N	B - 13	5	Eastern half of floor, centrally located, west side of shaft area.
13 S	B - 9	5	East wall of Paint Vault, about ten feet off floor.
8	B - 8	5	Central location on "I" beam, north side: at transformer and electrical boxes.
9	B - 9	5	East wall of paint vault, about seven and one half feet off the floor.
10	B - 10	5	Central location, at bubbler and soil pipe on "I" beam.
18	B - 18	I	South east corner of building, but outside of closed in area which is located on south and ea end of the building.
38	B - 38	5	North east corner on east side of existing spray booth.
12	B - 12	2	Up the ladder, north wall about midpoint.

WATER FLOW TEST FOR BUILDING RISERS:

Riser:	Valve Location:	Floor:	Location:
23	B - 23	1	East wall in the north corner behind the press.
31	B - 30	1	East wall, north corner into soil pipe.
20 N	B - 20	4	Northeast corner, just south of the spray booth.
20 S	B - 20	Attic	Southwest corner.
34	B - 34	Penthouse	Stairway, east of buildings, no wall.
33	B - 33	4	East wall, center on south side of "I" beam: first "I" beam north of east stairway.
21	Penthouse	5	To top of stairs, sliding fire door, entrance to penthous located on north wall of penthouse.

31 AM

COLUMBUS STREET PLANT, FLOW TEST PROCEDURE.

Keys for alarm or transmitter box and key to rewind each transmitter of each riser is located on the board to rear of secretary.

TO START FLOW TEST: follow directions above transmitter box to TURN OFF ALARM.

Batteries are located on the north wall of Building 50, to the east of existing racks or storage shelves.

Batteries taking over in event of a service outtage.

The Batteries have a maximum of 12 hours. However, the actual limitation depends or is dependent on battery life. Generally speaking the batteries should have about a three (3) or four (4) hour expectancy as to performance.

The location of the flow test valves can best be shown on a plant sketch, below is the written location.

100. New dock area, east wall, north corner by walk out door.

1. Loading dock, north side, west end, Building 50 A.
2. North east corner of building 50, Riser 2.
3. North east corner of cement block partition of building 50, Riser 3.
4. Building 50, north wall, between office and power room, Riser 4.
5. Building 50, north wall, between office and power room, about 3 feet west of flow test valve for Riser 4, Riser 5.
6. Building 51, north wall at dock area, Riser 6.
7. North east corner of paint vault, Riser 7.
8. North wall of new spray booth area, Riser 8 (two valves are available.)

Continuation

COLUMBUS STREET PLANT, FLOW TEST PROCEDURE AND VALVE LOCATION.

9. Maintenance work shop area, north wall, east end, Riser 9.

ROOSEVELT AVENUE PLANT:

WATER FLOW TEST FOR BUILDING RISERS:

No key is necessary on transmitter box, follow directions on the box to silence.

Three (3) Risers, three (3) flow tests to be conducted.

Riser:	Valve Location:	Floor:	Location:
40 - 1	41	1	East wall, north corner, to the right of the spray booth.
40 - 2	41	1	Loading dock, west wall.
40 - 3	40	1	South end, west wall.

3/AP

H-2 Implementation of Training Program

Employees, upon completion of the training program, sign a form indicating successful completion of the program. This form becomes a part of the employee's personnel file.

I Closure and Post Closure Requirements

I-1 Closure Plan

CLOSURE PLAN FORMAT FOR STORAGE FACILITY

Facility I.D. Number WID000608398

Owner or Operator's Name Hamilton Industries
Address 1316 - 18th Street
Two Rivers, WI 54241
Phone Number (414) 793-1121

Facility Address 1316 - 18th Street
Two Rivers, WI 54241

I. Facility Conditions

A. General Information

1. The size of the storage facility is 19' x 34'

2. Storage methods include:
   a. 35 - 55 gallon steel drums
   b. 3 - 1000 gallon steel tanks

3. Other facilities include two boilers capable of each burning 60 gallons of waste solvent per hour.

4. The waste identification is solvents and paint waste.

B. Maximum Amount of Inventory would be:

35 full 55 gallon drums	- 1925 gallons
2 tanks at 838 gallons each	- 1676 gallons
1 tank at 828 gallons	- 828 gallons
Total on hand	- 4429 gallons

C. The Following is the Inventory of Equipment:

1. 3 - 1000 gallons steel tanks
2. 2 - "Cat" solvent pumps
3. 120 feet of 1-1/2" pipe
4. 225 feet of 3/4" pipe
5. 2 - injection burners
6. 1 - Aro drum pump
7. Miscellaneous connectors, oilers, and valves

D. Schedule for Completing Closure

1. Time required for removal of inventory and decontamination of equipment would be 136 hours of labor at $19.14 per hour.

II. Removal of Inventory

A. Off-site treatment, disposal, or storage

1. Quantity: 87 - 55 gallon drums or 4785 gallons

2. Removal of 2000 gallons of waste from the storage tanks into 55 gallon steel drums would be by pumping with an Aro pump. All 55 gallon drums would be disposed of at E.S.L. in Elwood, Illinois at a cost of $67.10 per drum.

III. Decontaminating the Facility

A. Areas of the facility with potential for soil contamination are none. The entire area is of a concrete flooring and cement block side walls. This area may have to be washed down and the materials disposed of at E.S.L. Landfill.

B. Equipment. The following equipment must be decontaminated.

1. Three 1000 gallon tanks. These will be flushed and washed down and material disposed of at E.S.L. Landfill in Illinois.

2. Estimate of flushing and residue from tanks and other miscellaneous equipment would be 15 - 55 gallons drums of material.

3. Removal of this material would be along with all other materials to the E.S.L. Landfill in Illinois.

C. Structures

1. The entire area is cement floors or cement driveway. The storage area is cement block walls with no chance of leakage. There should be no necessary decontamination of this area. If any material would be spilled at time of closure, it would be included in the equipment decontaminating.

2. The closure cost estimate includes disposal off-site of entire inventory.

3. Disposal cost off-site by Waste Management of Wisconsin is attached.

I-1 Closure Plan

VII. Closure and Post Closure

(Part 265 Subpart G)

(A) Closure and Post Closure:

(a) When closure would occur for hazardous waste disposal at Hamilton Industries, the following would be necessary:

Remove two 275 gallon tanks to an approved landfill.

Remove three 1000 gallon tanks to an approved landfill.

Remove Aro pump and use for paint operation.

Remove Ace pump and dispose of at an approved landfill.

Remove all piping and dispose of at an approved landfill.

No plans are in the immediate future to close down this operation.

Dave Tice

I-1a Closure Performance Standard

The closure as indicated by I-1 above would result in a clean room which would not require post-closure maintenance.

I-1b Partial and Final Closure Activities

No partial closure is anticipated. The final closure is estimated to take place in 2010. All equipment would be dismantled and disposed of at E.S.L. Landfill in Elwood, Illinois, as described in the closure plan in I-1.

I-1c Maximum Waste Inventory

The maximum waste inventory which could be on hand at one time would be 4429 gallons. This consists of 828 gallons in one tank, 838 gallons in each of the other 2 tanks and 1928 gallons in thirty-five 55 gallon drums.

I-1d Inventory Removal, Disposal or Decontamination of Equipment

All waste remaining in the storage tanks would be pumped into 55 gallon drums using an Aro pump. The drums would be disposed of at E.S.L. Landfill in Elwood, Illinois.

All tanks and other miscellaneous equipment would be flushed and washed down and the equipment and waste materials disposed of at E.S.L. Landfill in Illinois.

The cement floors in the storage rooms and the cement driveway would be decontaminated and the residue disposed of at the E.S.L. Landfill.

I-1d (1) Closure of Containers

Described in I-1d above.

I-1d (2) Closure of Tanks

All waste remaining in the storage tanks would be pumped into 55 gallon drums using an Aro pump. The drums would be disposed of at E.S.L. Landfill in Elwood, Illinois. All tanks and other miscellaneous equipment would be flushed and washed down and the equipment and waste materials disposed of at E.S.L. Landfill in Illinois.

The cement floors in the storage rooms and the cement driveway would be decontaminated and the residue disposed of at the E.S.L. Landfill.

I-1g Schedule for Closure

The estimated date of closure is 2010. The total time to close the facilities is estimated at 136 hours.

I-1h Extensions for Closure Time

No extension would be necessary. Since 90 days are allowed for closure after receiving the final volume of wastes, our closure time estimate of 17 days is well within the limit.

I-4 Closure Cost Estimate

The closure cost estimate is as indicated in the closure plan attached to this sheet.

I-4 Closure Cost Estimate

HAMILTON INDUSTRIES CLOSURE FUND FOR HAZARDOUS WASTE

I.	REMOVAL OF INVENTORY		
	A. Removal of 35 full 55 gallon drums @ $68.00 each	$2380	
	B. Removal of 2000 gallons from tanks @ $1.236 per gallon	$2472	
			$4852
II.	DECONTAMINATION		
	A. 3 - 1000 gallon tanks - 48 hours @ $19.14 per hour	$ 919	
	B. Piping and pumps - 48 hours @ $19.14 per hour	$ 919	
	C. Disposal of residue from tanks - 15 drums @ $68.00 per drum	$1020	
	D. Dispose of tanks and equipment - 40 hours @ $19.14 per hour	$ 766	
			$3624
III.	ADMINISTRATION & CONTINGENCIES		
	A. Paperwork and supervision of closure activities - 15% of $3624	$ 544	
	B. Contingencies - 15% of $3624	$ 544	
			$1088
			$9564

CB = C(1.090654952)

CB = $9564 x 1.090654952 = $10,431

III. ADMINISTRATION AND CONTINGENCIES

Current:

A.	Paperwork and supervision of closure activities - 15% of $4,148.	$ 622
B.	Contingencies - 15% of $4,148.	$ 622
	Subtotal	$ 1,244
*	TOTAL	$10,862

Proposed:

A.	Paperwork and supervision of closure activites - 15% of $10,560		$ 1,584
B.	Contingencies - 15% of $10,560.		$ 1,584
			$ 3,168
	TOTAL		$40,934

I-5 Financial Assurance Mechanism for Closure

A copy of a Surety Bond is enclosed in I-5b and I-5b(2).

I-56

SCHWARTZ BROTHERS INSURANCE AGENCY, INC.
COMPLETE COVERAGE
135 SOUTH LA SALLE STREET, CHICAGO, ILLINOIS 60603
AREA CODE 312 - 630-0800

December 8, 1982

Hamilton Industries, Inc.
1316 18th Street
Two Rivers, Wisconsin 54241

Attention: Mr. Robert Beaupre

RE: Closure Performance Bond
State of Wisconsin

Dear Bob:

I am enclosing the Closure Performance Bond for the State of Wisconsin which Jeanne requested. The bond is written effective January 15, 1983.

Our invoice for the premium will follow.

Very truly yours,

Dorothy

Dorothy McNally

/dm
encl.

34A

III. ADMINISTRATION AND CONTINGENCIES

Current:

A.	Paperwork and supervision of closure activities - 15% of $4,148.	$ 622
B.	Contingencies - 15% of $4,148.	$ 622
	Subtotal	$ 1,244
*	TOTAL	$10,862

Proposed:

A.	Paperwork and supervision of closure activites - 15% of $10,560	$ 1,584
B.	Contingencies - 15% of $10,560.	$ 1,584
		$ 3,168
	TOTAL	$40,934

Hamilton INDUSTRIES

Two Rivers Wisconsin 54241 Telephone 414 793-1121
Telex 026-9536

December 15, 1982

Department of Natural Resources
P. O. Box 7921
Madison, WI 53707

Attn: Paul P. Didier, P.E.

Re: Cancellation of Closure Bond for American Hamilton,
Bond #400GA6922. Refer to: 4430

Dear Mr. Didier:

The Closure Performance Bond for our Hazardous Waste Facilities with St. Paul Fire and Marine Insurance Company will expire on January 28, 1983.

Attached please find our new Closure Performance Bond with United States Fidleity & Guaranty Company effective January 15, 1983.

Hamilton Industries, Inc. was formerly American Hamilton, a Division of American Hospital Supply Corporation.

If you have any questions regarding this, please contact me.

Sincerely,

HAMILTON INDUSTRIES

David L. Tice

David L. Tice

DLT:rak

cc: Samuel T. Lawton, Chicago, IL
James Reyburn, Green Bay

ATTORNEY-IN-FACT AFFIDAVIT

STATE ~~OR COMMONWEALTH~~ OF Illinois
COUNTY ~~OR CITY~~ OF Cook } ss:

Before me, a Notary Public, personally came Raymond L. Miller known to me, and known to be the Attorney-in-Fact of United States Fidelity and Guaranty Company, a Maryland Corporation, which executed the attached bond as surety, who deposed and said that his signature and the corporate seal of said United States Fidelity and Guaranty Company were affixed by order and authority of said Company's Board of Directors, and that the execution of the attached bond is the free act and deed of United States Fidelity and Guaranty Company.

Given under my hand and seal this 29th day of November, 19 82.

My Commission Expires May 21, 1983

Dorothy J. McNally
Notary Public.

My Commission expires _____

Jud. 876 (9-57)

34C

CERTIFIED COPY

GENERAL POWER OF ATTORNEY

No. 87205

Know all Men by these Presents:

That UNITED STATES FIDELITY AND GUARANTY COMPANY, a corporation organized and existing under the laws of the State of Maryland, and having its principal office at the City of Baltimore, in the State of Maryland, does hereby constitute and appoint

Edward H. Schwartz, Thomas Wiley, Raymond L. Miller and Dorothy J. McNally

of the City of Chicago, State of Illinois
its true and lawful attorneys in and for the State of Illinois

for the following purposes, to wit:

To sign its name as surety to, and to execute, seal and acknowledge any and all bonds, and to respectively do and perform any and all acts and things set forth in the resolution of the Board of Directors of the said UNITED STATES FIDELITY AND GUARANTY COMPANY, a certified copy of which is hereto annexed and made a part of this Power of Attorney; and the said UNITED STATES FIDELITY AND GUARANTY COMPANY, through us, its Board of Directors, hereby ratifies and confirms all and whatsoever the said anyone of the said Edward H. Schwartz and the said Thomas Wiley and the said Raymond L. Miller and the said Dorothy J. McNally

may lawfully do in the premises by virtue of these presents.

In Witness Whereof, the said UNITED STATES FIDELITY AND GUARANTY COMPANY has caused this instrument to be sealed with its corporate seal, duly attested by the signatures of its Vice-President and Assistant Secretary, this 10th day of September, A. D. 1976

UNITED STATES FIDELITY AND GUARANTY COMPANY.

(Signed) By D. H. Meehan
Vice-President.

(SEAL)

(Signed) Duval A. Edwards
Assistant Secretary.

STATE OF MARYLAND, }
BALTIMORE CITY, } ss:

On this 10th day of September, A. D. 1976, before me personally came D. H. Meehan, Vice-President of the UNITED STATES FIDELITY AND GUARANTY COMPANY and Duval A. Edwards, Assistant Secretary of said Company, with both of whom I am personally acquainted, who being by me severally duly sworn, said that they resided in the City of Baltimore, Maryland; that they, the said D. H. Meehan and Duval A. Edwards were respectively the Vice-President and the Assistant Secretary of the said UNITED STATES FIDELITY AND GUARANTY COMPANY, the corporation described in and which executed the foregoing Power of Attorney; that they each knew the seal of said corporation; that the seal affixed to said Power of Attorney was such corporate seal, that it was so fixed by order of the Board of Directors of said corporation, and that they signed their names thereto by like order as Vice-President and Assistant Secretary, respectively, of the Company.

My commission expires the first day in July, A. D. 19...78...

(SEAL) (Signed) Herbert J. Aull
Notary Public.

STATE OF MARYLAND }
BALTIMORE CITY, } Set.

I, Robert H. Bouse, Clerk of the Superior Court of Baltimore City, which Court is a Court of Record, and has a seal, do hereby certify that Herbert J. Aull, Esquire, before whom the annexed affidavits were made, and who has thereto subscribed his name, was at the time of so doing a Notary Public of the State of Maryland, in and for the City of Baltimore, duly commissioned and sworn and authorized by law to administer oaths and take acknowledgments, or proof of deeds to be recorded therein. I further certify that I am acquainted with the handwriting of the said Notary, and verily believe the signature to be his genuine signature.

In Testimony Whereof, I hereto set my hand and affix the seal of the Superior Court of Baltimore City, the same being a Court of Record, this 10th day of September, A. D. 1976

(SEAL) (Signed) Robert H. Bouse
Clerk of the Superior Court of Baltimore City.

34 D

FS 3 (9-67)

I-5B-(2)

State of Wisconsin
Department of Natural Resources

CLOSURE PERFORMANCE BOND
(For Use by Solid Waste Land Disposal Sites and Hazardous Waste Facilities)
Form 4400-65 Rev. 9-81

LEAVE BLANK – DNR USE ONLY
Regulatory Code
EPA Identification Number
License Number
Name of Licensee
Closure Cost Estimate

KNOW ALL MEN BY THESE PRESENTS, that Hamilton Industries, Inc. (Owner)

of 1316 18th Street, Two Rivers, Wisconsin 54241 (Address), as Principal, and

United States Fidelity and Guaranty Company (Name of Surety Company), a surety company organized

and existing under the laws of the State of Maryland and duly authorized to do surety business in the State of Wisconsin, as Surety, are held and firmly bound unto the State of Wisconsin Department of Natural Resources, as Obligee, in the penal sum of Eleven Thousand Three Hundred Ninety One and no/100ths dollars ($ ~~11,391.00~~), for payment of which the Principal and the Surety bind themselves, their heirs, executors, administrators, successors and assigns, jointly and severally.

WHEREAS, the Principal owns a solid waste land disposal site or hazardous waste facility named Hamilton Industries, Inc _____ located in Two Rivers (Section, Township and Range), Town/City/Village of

Manitowoc, _____ County, Wisconsin, and that site or facility

is subject to either the closure requirements of the plan of operation approval issued by the Obligee, dated this _____ day

of _____, 19 _____, and any amendments thereto or the closure requirements of sections NR 181.42(8) and NR 181.44(12) and (13), Wisconsin Administrative Code, if applicable to the site or facility.

WHEREAS, section 144.44(3)(c), Wisconsin Statutes, requires that the Principal provide the Obligee with proof of financial responsibility ensuring that the closure requirements of the plan of operation approval, if any, will be complied with by the Principal and any successor in interest.

WHEREAS, this bond is written to provide proof of financial responsibility pursuant to section 144.44(3)(c), Wisconsin Statutes, and section NR 180.15 or NR 181.42(10), Wisconsin Administrative Code, to ensure compliance with the closure requirements of the plan of operation approval and any amendments thereto or the closure requirements in sections NR 181.42(8) and NR 181.44(12) and (13), Wisconsin Administrative Code, if applicable, and shall inure to the benefit of the Obligee.

NOW, THEREFORE, the condition of this obligation is such that if the Principal or any successor in interest complies with the closure requirements of the plan of operation approval and any amendments thereto or the closure requirements in sections NR 181.42(8) and NR 181.44(12) and (13), Wisconsin Administrative Code, if applicable, and closes the facility identified above in accordance with these closure requirements then and only then, this obligation shall be void; otherwise, it shall remain in full force and effect.

The Surety shall become liable on this bond obligation only upon a determination by the Obligee, subject to judicial review, that the Principal has failed to fulfill the above condition. Following such a determination, the Surety must either complete closure of the facility in accordance with the plan of operation approval and any amendments thereto or the closure requirements in sections NR 181.42(8) and NR 181.44(12) and (13), Wisconsin Administrative Code, if applicable, or pay the amount of this bond as directed by the Secretary of the Obligee.

I-9a USE OF STATE REQUIRED MECHANISM

(Enclosure 23) Attached is a copy of the Closure Performance Bond for the State of Wisconsin:

EPA I.D. WID00608398
Hamilton Industries, Inc.
1316 - 18th Street
Two Rivers, WI 54241
Amount of Surety Bond $11,391.00

We respectfully request that this state mechanism be considered acceptable.

I-8 Liability Requirements

See I-8a

I-8a Coverage for Sudden Accidental Occurrences

See attached Liability Insurance Copy.

J Other Federal Laws

To the best of our knowledge, our waste activities are not inconsistant with the following federal laws: The Wild and Scenic Rivers Act, National Historic Preservation Act of 1966, Endangered Species Act, Coastal Zone Management Act, and Wildlife Coordination Act.

K- PART B CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

Charles H. Kasal

Charles H. Kasal
V.P., Engineering